


<b>Change Number</b> M-16-22-02	<b>Federal Facility Agreement and Consent Order Change Control Form</b>		<b>Date</b> 01/24/2022
<b>Originator</b> Mark French, DOE-RL			<b>Phone</b> 509-373-9863
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
<b>Change Title</b> Establish New Negotiated M-016 Series Milestones in TPA, Appendix D			
<b>Description/Justification of Change</b>  On September 16, 2021, the U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology), hereafter referred to as the Parties, agreed to pilot an “Adaptive Milestone Approach” for identifying scope and schedule for Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones for work on the Central Plateau. This Adaptive Milestone Approach aims to define achievable milestones that can demonstrate cleanup progress and be more nimble to emerging priorities, progress, issues and resource constraints. The approach will utilize decision logic tools to consider varying scenarios, priorities, and constraints to Central Plateau cleanup with a goal of providing objective insight to optimum work sequences and timing of critical work activities. The outputs will inform meaningful discussion among the Parties when negotiating future enforceable milestone sets. <i>Continued on page 2</i>			
<b>Impact of Change</b> This change control form creates 3 new M-016 series interim Milestones: M-016-92C, M-016-201, and M-016-202. This change control form also establishes new interim Milestone M-016-200 for DOE-RL to submit a draft HFFACO change control form which will establish the new due dates for 2 existing interim Milestones M-016-200A and M-016-200B. This change control form does not include a change to the due date for Major Milestone M-016-00. The Parties expect that DOE will, in the future, propose a change to Major Milestone M-016-00 based on the Adaptive Milestone Approach described in the Description/Justification of Change. This change control form is being processed in conjunction with Change Control Forms M-15-22-02 and M-85-22-02 that also modify M-015 and M-085 milestones in HFFACO Appendix D.			
<b>Affected Documents</b> HFFACO or Tri-Party Agreement (TPA) Action Plan Appendix D, “Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency.”			
<b>Approvals</b>			Page 1 of 3
<b>William F. Hamel</b> Digitally signed by William F. Hamel Date: 2023.01.18 13:34:34 -08'00'		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
W.F. Hamel, DOE-RL	Date		
N/A		Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	
DOE-ORP	Date		
 Digitally signed by DAVID EINAN Date: 2023.01.19 12:46:29 -08'00'		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.R. Einan, EPA	Date		
N/A		Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	
D.B. Bowen, Ecology	Date		

### **Description/Justification of Change (continued)**

Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

With the agreement to pilot the Adaptive Milestone Approach, fourteen interim milestones listed in IAMIT Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>) were placed in abeyance. This change control form will create milestones to offset the impacts of placing in abeyance these interim milestones by:

- Establishing a 2024 milestone for DOE-RL to submit change control forms that identify new dates for the M-016 interim milestones placed in abeyance.
- Establishing a milestone to complete Environmental Restoration Disposal Facility (ERDF) Supercell 11 Design. This design is needed to construct a new cell that will allow for future disposal of contaminated soil and building demolition debris.
- Establishing a milestone for the 231Z Materials Engineering Laboratory to support progress towards demolishing the building and disposing of contaminated debris.
- Establishing a milestone for Outer Area waste site response actions that can be performed independently from adaptive milestone planning. Confirmatory sampling or remove treat and dispose (RTD) will be performed per existing response action decisions. The Outer Area waste sites (identified by Waste Information Data System Identification [WIDS ID]) planned for confirmatory sampling and RTD as required are 600-354, 600-355, 600-359, 600-360, 600-361, 600-362, 600-363, 600-387, 600-392, and 600-394. If confirmatory sampling indicates remediation is required for these sites, RTD will be completed by the milestone date. The Outer Area waste sites (identified by WIDS ID) planned for confirmatory sampling only are 200-E-46, 200-W BP, CTFN 2703-E, 600-71, and 600-227.

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

**Authorized Changes**

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p><u><b>M-016-92C</b></u>   <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete ERDF Supercell 11 Design and submit to EPA for approval.</u></p>	<p><u>09/30/2024</u></p>
<p><u><b>M-016-201</b></u>   <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete non-intrusive characterization of process piping, tanks and gloveboxes, and electrical/mechanical isolation for the 231Z Materials Engineering Laboratory.</u></p>	<p><u>09/30/2023</u></p>
<p><u><b>M-016-200</b></u>   <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit to EPA, a draft HFFACO change control form identifying new enforceable due dates for the following TPA interim milestones that were put In Abeyance by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> <li>• <u>M-016-200A, Complete U Plant canyon (221 U Facility) demolition in accordance with the Remedial Design/Remedial Action Work Plan.</u></li> <li>• <u>M-016-200B, Complete U Plant (221 U Facility) barrier construction in accordance with the Remedial Design/Remedial Action Work Plan.</u></li> </ul>	<p><u>06/30/2024</u></p>
<p><u><b>M-016-202</b></u>   <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete response actions (confirmatory sampling and remove treat dispose, as required) for 10 waste sites in the Outer Area and confirmatory sampling for an additional 5 waste sites in the Outer Area.</u></p>	<p><u>09/30/2024</u></p>